

**FILED**  
**11/18/2021**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISIONTHOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

RICHARD WILLIAMS

CASE NUMBER: 21CR707

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. Beginning in or around June 2019 and continuing to on or about November 17, 2021, at Midlothian, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant violated:

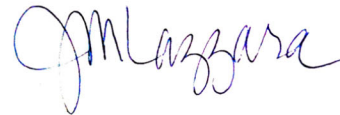
*Code Section*

Title 18, United States Code, Section 2422(b)

*Offense Description*

use of a facility and means of interstate and foreign commerce to knowingly attempt to persuade, induce, and entice "Minor A", whom defendant believed to be a female minor who had not attained the age of 18 years, but who in fact was an undercover law enforcement officer, to engage in sexual activity for which a person could be charged with a criminal offense, namely, Aggravated Criminal Sexual Abuse, in violation of 720 ILCS 5/11-1.60(d)

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

JACQUELINE LAZZARA

Task Force Officer, Federal Bureau of Investigation (FBI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: November 18, 2021 2:45pm*Judge's signature*City and state: Chicago, IllinoisJEFFREY COLE, U.S. Magistrate Judge*Printed name and title*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

**AFFIDAVIT**

I, JACQUELINE LAZZARA, being duly sworn, state as follows:

1. I am a Task Force Officer with the Federal Bureau of Investigation (FBI), and have been so employed for nine years. My current responsibilities include the investigation of child exploitation and child pornography.

2. This affidavit is submitted in support of a criminal complaint alleging that RICHARD WILLIAMS has violated Title 18, United States Code, Section 2422(b). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging WILLIAMS with attempted enticement of a minor, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, and my review of records and media.

**I. FACTS ESTABLISHING PROBABLE CAUSE**

4. As described more fully below, defendant RICHARD WILLIAMS, a 35-year-old male, used the social media application Instagram, in addition to text

messages, to communicate online with an underage female, Minor A<sup>1</sup>, in an attempt to entice her to meet with him to engage in illicit sexual activity. Specifically, as outlined below, WILLIAMS used the Instagram accounts: [Subject Account 1], [Subject Account 2], [Subject Account 3], [Subject Account 4], and [Subject Account 5] to communicate with Minor A through the internet.<sup>2</sup> On November 17, 2021, WILLIAMS planned to meet with “Minor A”<sup>3</sup> in order to engage in illicit sexual activity. WILLIAMS traveled to a predetermined convenience store in Midlothian, Illinois, in order to pick up Minor A for purposes of illicit sexual contact. Following his arrest, in a post-*Miranda* interview, WILLIAMS admitted to agents to traveling to engage in sexual activity with Minor A—who he knew to be a minor—and admitted to previously communicating with Minor A via Instagram and text messages about illicit sexual activity.

#### **A. Background of Investigation**

5. In or around May 2021, Minor A’s mother contacted the FBI after discovering WILLIAMS’ attempts to contact Minor A online for purposes of illicit sexual conduct. Minor A’s mother reported that she believed an adult male made a

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<sup>1</sup> Minor A is currently 15 years old. Minor A was 13 years old when WILLIAMS first began trying to entice her.

<sup>2</sup> During his post-arrest interview, WILLIAMS acknowledged using each of these Instagram accounts to communicate with Minor A.

<sup>3</sup> As noted below, in May 2021 after Minor A’s mother contacted the FBI regarding WILLIAMS’ attempts to engage in illicit sexual contact with Minor A, the FBI took over Minor A’s account and communicated with WILLIAMS while posing as Minor A.

“fan page” of her then-15-year-old daughter on Instagram.<sup>4</sup> Minor A’s mother reported that she believed it to be the same adult male who had been harassing Minor A for the past two years, including by sending sexually explicit messages to Minor A.

6. According to Minor A, Minor A met a man who said his name was “Richard Williams” at WILLIAMS’ workplace, a fast-food establishment in Midlothian, Illinois, sometime in 2019<sup>5</sup> when Minor A was in 7th grade.<sup>6</sup> Minor A said she would frequent this restaurant after school with friends. On one occasion, WILLIAMS asked Minor A for her social media account name. Minor A provided her Instagram username as requested. At the time, Minor A believed WILLIAMS to be approximately 15 or 16 years old.<sup>7</sup>

7. According to Minor A, shortly after this encounter, Minor A received a direct message on Instagram from username, [Subject Account 1]. Minor A believed this to be the “Rich Williams” she’d met. According to Minor A, the Instagram user

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<sup>4</sup> Based on my training and experience, I’m aware that Instagram allows users to create pages on Instagram portraying pictures and text. I believe that by “fan page,” Minor A’s mother meant a page about Minor A, featuring pictures of her.

<sup>5</sup> A review of messages from this time suggests Minor A met WILLIAMS in or about June 2019.

<sup>6</sup> Any quoted language, transcriptions, or summaries of communications set forth in this Affidavit are non-final drafts. Summaries, quotations, or transcriptions set forth in this Affidavit do not include all potentially criminal communications, or all statements or topics covered during the course of the conversations. The communications set forth in this Affidavit often include my understanding and my fellow investigators’ and agents’ understandings, of what is being said during such conversations set forth in brackets. This understanding and interpretation of the conversations is based on (i) the content and context of the conversations, (ii) my experience and my fellow agents’ experiences as law enforcement officers, and (iii) the investigation to date.

<sup>7</sup> In fact, WILLIAMS was a 33 year old adult male.

[Subject Account 1] sent a photo of male genitalia to Minor A.<sup>8</sup> According to Minor A, WILLIAMS subsequently thanked Minor A for letting him follow her Instagram and said he enjoyed looking at her photographs. Minor A asked WILLIAMS how old he was and he stated 32. Minor A informed WILLIAMS she was 13 years old and told him, “I’m sorry but it’s not ok for you to text me”.<sup>9</sup>

8. According to a review of Minor A’s Instagram account’s direct messages:<sup>10</sup>

a. On or about August 16, 2019, WILLIAMS reached out to Minor A. Minor A stated she didn’t think they should chat, and that he should stop contacting her because he’s 32 years old and it’s illegal.

b. On or about August 24, 2019, WILLIAMS reached out to Minor A again and Minor A replied, “stop texting me”, “Frfr” [for real, for real], and “I will report you.”

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<sup>8</sup> I reviewed Minor A’s direct messages in her Instagram account. I observed text chats between Minor A and [Subject Account 1], which contained a placeholder for an image that I believe was the image in question. But the image did not appear during my review—only a placeholder for the image. Although I don’t know the precise reason why the picture was no longer available, one possibility—based on my training and experience—is that the picture became unavailable upon the [Subject Account 1] account being deactivated by Instagram.

<sup>9</sup> I observed these referenced messages between [Subject Account 1] and Minor A regarding their respective ages.

<sup>10</sup> At the time I reviewed these messages in Minor A’s direct messages, [Subject Account 1] had been deactivated. Accordingly, the messages were listed as being between Minor A and the generic, “Instagram User.” However, I also reviewed screenshots of messages from this time that Minor A took and preserved, and these pictures showed that the conversations had been with [Subject Account 1]. Further, during his post-arrest interview, WILLIAMS was shown these communications and he confirmed they were his messages with Minor A.

c. On or about August 25, 2019, WILLIAMS reached out to Minor A again and asked why she gave him her Instagram. Minor A replied, “Cause I didn’t know you were so old,” “Stop fuckin texting me you creep,” and “you’re a fucking pedophile.” WILLIAMS replied: “What makes you think I’m a pedophile? A pedophile is defined as an adult who wants to have sex with a prepubescent child.” Minor A replied: “Me the child,” “You the adult,” and “Texting the child.” Minor A also referenced the photo of male genitalia that WILLIAMS sent her, “Bro I have the picture you sent me,” “Stop being a fucking creep,” and “Or I will block and report you Bye.”

9. On or about September 11, 2019, WILLIAMS replied to Minor A’s Instagram post with a direct message. In particular, WILLIAMS asked if it would be okay for them to be best friends and kiss and hug and chill and go on dates together. Minor A replied, “no you fucking weirdo.” Minor A then blocked the account, [Subject Account 1] on Instagram.

10. According to a screenshot I reviewed, on or about January 25, 2021, the Instagram user, [Subject Account 6], messaged Minor A and said he was “Rich Williams,” and apologized for coming off as a creep.<sup>11</sup> He asked, “why are u pedophobic? , pedos have good [male genitalia], don’t you like good [male genitalia]? How can you like weed but not getting fucked by pedophiles? Let me show you how

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<sup>11</sup> Agents have not observed any communications between the time when Minor A blocked [Subject Account 1] in September 2019 and this January 2021 communication from [Subject Account 6]. During his post-arrest interview, WILLIAMS said he would “troll” Minor A for a few days and then stop for several months.

fun it is to have a pedophile boyfriend (smiley face emoji) If you let me be your boyfriend I'll make sure you never pay for [Fast Food Company A] another day in your life.”<sup>12</sup>

**B. Instagram Messages Exchanged between the Undercover Officer posing as Minor A and WILLIAMS**

11. On or about May 6, 2021, an undercover officer (the “UC”) took over Minor A’s Instagram account. During their conversations, the UC/Minor A told [Subject Account 5], used by WILLIAMS, that the UC/Minor A was only 15 years old.<sup>13</sup> WILLIAMS continued to ask the UC/Minor A to engage in sexual conduct with him. The following are summaries of several conversations between the UC, posing as Minor A, and WILLIAMS who was using the Instagram [Subject Account 5]:

a. On or about, May 6, 2021, WILLIAMS, using the Instagram account, [Subject Account 5], sent a direct message to the UC/Minor A, asking if she missed him.<sup>14</sup> The UC/Minor A stated she is 15 years old and WILLIAMS stated he is 34. WILLIAMS stated, “but I still like to look at you when I play with myself,” and asked if they could spend time together since every time he saw her he was working. WILLIAMS also stated that the UC/Minor A was nice to him until she found out his age and he had a crush on her.

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<sup>12</sup> During his post-arrest interview, WILLIAMS could not confirm whether he used the account [Subject Account 6].

<sup>13</sup> During his post-arrest interview, WILLIAMS confirmed he used the Instagram account [Subject Account 5].

<sup>14</sup> Subpoena results from Instagram showed that [Subject Account 5] had the subscriber “Richard Williams” with the phone number “xxx-xxx-7773.” A separate subpoena response from Sprint for xxx-xxx-7773 showed the subscriber: Richard Williams, at the address associated with WILLIAMS.



b. On or about May 7, 2021, WILLIAMS, using the Instagram account, [Subject Account 5], sent a direct message to the UC/Minor A saying, “I’m just curious, has any pedophiles ever tried to date you before or am I the only one?” WILLIAMS also stated that the last time he had a girlfriend was five years ago. WILLIAMS said they started dating when the girl was 15 years old and they broke up when she was 17. WILLIAMS acknowledged Minor A was 15 years old and that WILLIAMS would be 35 years old on November 12. He asked if they could be boyfriend and girlfriend.

c. On or about May 12, 2021, WILLIAMS, using the Instagram account, [Subject Account 5], asked the UC/Minor A what they would do if they hung out. He suggested that they could go to his apartment and cuddle, smoke weed, watch a movie and “when the movie goes off or TV show, we can put on your favorite (music note emoji) while we [engage in sexual intercourse] <sup>15</sup>.” WILLIAMS asked if the UC/Minor A liked to get “your [female genitalia] licked,” and said that would be fun to do while Minor A was eating ice cream and high. The UC/Minor A stated she was concerned about getting pregnant, and WILLIAMS assured her she wouldn’t. WILLIAMS, using the Instagram account, [Subject Account 5], explained he got a girl pregnant in 2016 and when he went to jail, the baby passed away. He stated he met the girl when she was 10 years old and she became his girlfriend when she was 15. WILLIAMS stated she started living with him when she was 16, along with her 12-

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<sup>15</sup> I have sanitized some of the language used by WILLIAMS during the chats with Minor A. The government can provide the Court with a copy of the unsanitized chats upon request.



year-old sister. He stated he was arrested and charged with two counts of harboring a runaway.<sup>16</sup> WILLIAMS, using the Instagram account, [Subject Account 5], asked the UC/Minor A if she trusted him enough to have sex with him and that he won't get her pregnant because, "I'll be extremely careful and it will be really fun." WILLIAMS further explained, "I understand if you're nervous at first but the more we do it the more comfortable you would be." "I'm real good at timing, I would not lose control and [ejaculate] inside of you. I will pull out in time."

d. On or about May 14, 2021, WILLIAMS, using the Instagram account, [Subject Account 5], said he was excited to know that they were doing something that they shouldn't be doing, and they were going to have to be sneaky, but the UC/Minor A would be safe with him. WILLIAMS, using the Instagram account, [Subject Account 5], acknowledged that in ten years, the UC/Minor A would be 25 and he would be 44. He explained, "I really like young girls and it's been so long since I've been with one," "I can't explain why but young girls turn me on." He further stated that his family and friends are afraid for him because people don't like pedophiles. He asked, "Would this be totally new for you?" "Do any of your friends have pedo boyfriends or would you be the first of your friends to have 1?" He asked if the UC/Minor A was a virgin and the UC/Minor A stated, "yes". WILLIAMS said that turns him on and he's looking forward to having sex with her.

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<sup>16</sup> WILLIAMS denied the veracity of these statements during his post-arrest interview.

**C. Text Messages Exchanged between the UC/Minor A and WILLIAMS between September 7, 2021 and November 17, 2021**

12. In late June 2021, the UC/Minor A ceased communications with WILLIAMS because the account [Subject Account 5] had been deactivated. In or about September 2021, the UC reinitiated communications with WILLIAMS by sending him text messages, with WILLIAMS using phone number xxx-xxx-7773.<sup>17</sup>

13. During text conversations between September 7, 2021, and November 7, 2021:

a. WILLIAMS acknowledged the UC/Minor A being 15 years old. WILLIAMS asked on multiple occasions if the UC would like to be his girlfriend. WILLIAMS also asked if the UC was “comfortable with the thought of dating a man 19 years older than you?” WILLIAMS asked if Minor A would be ok hanging out at his apartment.

b. WILLIAMS stated he would take public transportation to Midlothian, Illinois, and meet with the UC/Minor A at a predetermined location. WILLIAMS and the UC/Minor A would then take public transportation together to his apartment in Harvey, Illinois. WILLIAMS also offered to send an Uber to pick up the UC/Minor A. WILLIAMS stated, “this is supposed to be a sneaky link. Nobody we know is supposed to know about it,” and also, “there are a lot of people in jail because they trusted somebody that they shouldn’t have. I’m just saying I don’t want to be one of those people.”

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<sup>17</sup> During his post-arrest interview, WILLIAMS acknowledged using this phone number to text with Minor A.

c. WILLIAMS stated, “I mean tbh [to be honest] I thought about offering to pay you for some stuff before but if you do something like that for me I don’t want it to be because I’m paying you, I want it to be because you’re my girlfriend and you want to give it to me.” When asked what he would want the UC/Minor A to do, WILLIAMS replied: “The stuff they do in the videos I watch on my favorite apps.”<sup>18</sup>

d. WILLIAMS also asked the UC/Minor A if she would engage in multiple sexual acts with him while at his apartment when they met. WILLIAMS stated he would have her favorite things—iced tea and ho hos—at his apartment for her. WILLIAMS asked Minor A/UC if when they meet up, he could kiss her. WILLIAMS also stated, “I’ve been thinking about doing other things too...Like [performing oral sex on you],” but only if Minor A was comfortable. The UC/Minor A informed WILLIAMS that she was a virgin. WILLIAMS stated: “I am really good at controlling when I [climax]. As long as you’re comfortable having fun with me I know I’ll be able to give it to you real good without [climaxing] inside of you.” WILLIAMS also asked the UC if she would, “enjoy sucking my [male genitalia]?”

14. On or about November 3, 2021, the UC wrote to WILLIAMS that the UC/Minor A was nervous. WILLIAMS responded, “I guess I understand y u’re nervous but tbh [to be honest] I have just as much if not more reason to be.” The UC/Minor A stated “Ya I get it.” On or about November 4, 2021, the UC/Minor A

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<sup>18</sup> Based on my training and experience and the context of the conversation, including WILLIAMS’ prior statements to Minor A about watching pornography, I believe WILLIAMS was alluding to possibly paying Minor A to send him pornographic pictures and/or videos of Minor A.

stated, “I get that you’re nervous too. We don’t gotta do this. It’s cool,” and “Just wanted to tell you that”. WILLIAMS stated, “So whether we do this or not you’re cool and not disappointed at all?” UC stated, “ I mean I do want to but I get that u got more to b nervous about.” WILLIAMS asked UC if it would be possible for her to FaceTime him and she stated she could not. Later in the conversation, WILLIAMS stated, “Okay, I think I’m ready to go through with it and I promise I won’t get you pregnant before you’re ready to be a mother.”

15. Between November 7, 2021, and November 17, 2021, WILLIAMS and the UC continued to communicate, including about meeting in person to engage in sexual activity. During these conversations, on or about November 9, 2021, WILLIAMS asked the UC if she was “ready for the big day tomorrow,” referring to the plan between WILLIAMS and the UC/Minor A to meet in person. WILLIAMS stated, “I’ve been waiting for this day ever since I first laid eyes on you (smiley face with heart eyes emoji) and I want everything to be perfect.” WILLIAMS stated, “You have no idea how excited I am to finally be able to hold you in my arms and put my lips all over you (heart emoji, heart emoji).”

16. On November 15, 2021, WILLIAMS and the UC/Minor A discussed plans to meet on November 17, 2021. WILLIAMS stated he would take the bus to a convenience store in Midlothian, Illinois, to pick up the UC. WILLIAMS asked if the UC/Minor A would be comfortable with him taking her to a hotel since he was moving out of his apartment in Harvey, Illinois. WILLIAMS asked if there were any hotels close to her and the UC/Minor A stated she would try to look for some.

17. WILLIAMS asked the UC, “Cool, so how long will you be able to stay with me in the hotel?” “I just want to say be happy that you’re 15. Sometimes I really wish I could go back to that age”.

18. On November 16, 2021, WILLIAMS stated, “I can’t wait until my arms around you and I’m kissing every inch of your perfect body.” “Are you going to keep your eye open for any hotels around the neighborhood when you leave out today?”

19. WILLIAMS asked the UC/Minor A if she noticed any hotels in the area. The UC/Minor A stated she saw one near a bowling alley on Cicero Avenue. WILLIAMS then sent a photo of a hotel to the UC and asked if it is the correct hotel. The UC/Minor A replied “maybe”. WILLIAMS stated he could meet the UC at a convenience store in Midlothian, Illinois, so she wouldn’t have to walk far and then he could order a Lyft to take them to the hotel on Cicero.

20. On November 17, 2021, WILLIAMS stated that once he got off work he would walk across the street to their predetermined meet location. WILLIAMS said he and the UC/Minor A would then go to the hotel together and after they were finished he would order her a Lyft to take her home. After the UC/Minor A stated she was excited, WILLIAMS stated, “Extremely, there’s no doubt in my mind this will be one of the best days of my life (heart emoji).”

**D. WILLIAMS attempted to meet with Minor A on November 17, 2021.**

21. In light of the above-described plans to meet, on November 17, 2021, agents established surveillance around the predetermined location where the UC/Minor A was supposed to meet with WILLIAMS. The UC/Minor A remained in

text communication with WILLIAMS, who was updating the UC/Minor A on his whereabouts. The UC/Minor A informed WILLIAMS she was at the meet location, and agents in surveillance positions observed WILLIAMS travel from a barber shop to the meet location. WILLIAMS described what he was wearing and agents observed an individual matching this description approach the meeting location.<sup>19</sup> WILLIAMS walked into the meeting location and then placed WILLIAMS under arrest by federal agents after confirming his identity.

**E. Post-Arrest Interview**

22. WILLIAMS was transported to a police station. WILLIAMS was presented an Advice of Rights form, which he signed. During the subsequent voluntary interview, which was video recorded, WILLIAMS stated among other things:

a. WILLIAMS acknowledged Minor A was 13 years old when they originally met, he asked her for her social media information, which she provided, and WILLIAMS further acknowledged that Minor A said she didn't want to speak with him after that;

b. WILLIAMS acknowledged "trolling" Minor A over the past couple of years, including by making pages about Minor A on Instagram;

c. WILLIAMS acknowledged knowing Minor A was now 15 years old, and that he reached out via Instagram in or about May or June 2021, and

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<sup>19</sup> WILLIAMS said he was wearing four coats and a gray skull cap.

discussed how WILLIAMS wanted Minor A to be his girlfriend and to engage in sexual activity, including in his apartment;

d. WILLIAMS acknowledged that his phone number is xxx-xxx-7773, which he used to text with Minor A and to register Instagram accounts;

e. WILLIAMS stated he has an interest in young girls, but denied ever doing anything with young girls; and

f. WILLIAMS said the purpose of him traveling to meet Minor A was to pick up Minor A and travel to a hotel in order to engage in sexual activity.

**F. Instagram's servers are located outside of the state of Illinois.**

23. Based on my training and experience, I know that Instagram stores information associated with certain account(s) at premises located at or near 1601 Willow Road, Menlo Park, CA 94025.



## II. CONCLUSION

24. Based on the above information, there is probable cause to believe that WILLIAMS used a mail or facility or means of interstate or foreign commerce to knowingly attempt to persuade, induce, or entice “Minor A”, whom defendant believed to be a female minor who had not attained the age of 18 years, but who in fact was an undercover law enforcement officer, in any sexual activity for which any person can be charged with a criminal offense, namely, Aggravated Criminal Sexual Abuse, in violation of 720 ILCS 5/11-1.60(d), in violation of Title 18, United States Code, Section 2422(b).

FURTHER AFFIANT SAYETH NOT.



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JACQUELINE LAZZARA  
Task Force Officer, Federal Bureau of  
Investigation

SWORN TO AND AFFIRMED by telephone November 18, 2021.



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Honorable JEFFREY COLE  
United States Magistrate Judge